

FILED

OCT 25 2023

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. S1-4:23 CR 0513 HEA SPM
v.)	
)	
DENNIS LATOUR and)	
JENNIFER KEEGAN,)	
)	
Defendant.)	

SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about February 24, 2023 to September 26, 2023, in St. Louis County and elsewhere,
within the Eastern District of Missouri,

DENNIS LATOUR,

the Defendant herein, knowingly possessed one or more firearms, knowing he had previously been
convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding
one year, and the firearms traveled in interstate or foreign commerce during or prior to being in
the Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

The Grand Jury further charges that:

On or about February 24, 2023 to September 26, 2023, in St. Louis County and elsewhere,
within the Eastern District of Missouri,

DENNIS LATOUR and JENNIFER KEEGAN,

the Defendants herein, knowingly conspired to purchase one or more firearms, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of Dennis Latour, knowing and having reasonable cause to believe that Dennis Latour had previously been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Section 932(b)(1).

COUNT THREE

The Grand Jury further charges that:

On or about March 1, 2023, in St. Louis County, within the Eastern District of Missouri,

JENNIFER KEEGAN,

the Defendant herein, knowingly purchased a firearm in or otherwise affecting interstate or foreign commerce, for, on behalf of, at the request of and at the demand of Dennis Latour, knowing and having reasonable cause to believe that Dennis Latour had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Section 932(b)(1).

COUNT FOUR

The Grand Jury further charges that:

On or about March 23, 2023 to April 4, 2023, in St. Louis County, within the Eastern District of Missouri,

JENNIFER KEEGAN,

the Defendant herein, knowingly purchased one or more firearms in or otherwise affecting interstate or foreign commerce, for, on behalf of, at the request of and at the demand of Dennis Latour, knowing and having reasonable cause to believe that Dennis Latour had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Section 932(b)(1).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g) and 932(b) as set forth above, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in said violation.

2. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

SAYLER A. FLEMING
United States Attorney

JENNIFER SZCZUCINSKI, #56906(MO)
Assistant United States Attorney